

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Lazaro SANCHEZ JR

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Case No.

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 19, 2021 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

8 USC 1324

Offense Description

Knowing and in reckless disregard of the fact that an alien had come to, entered, and remained in the United States in violation of law, did transport and move and attempted to transport and move and conspired to transport and move such alien within the United States by means of transportation and otherwise in furtherance of such violation of law.

This criminal complaint is based on these facts:

Continued on Affidavit

☒ Continued on the attached sheet./S/Javier Medrano*Complainant's signature*Javier Medrano, Border Patrol Agent*Printed name and title*

Sworn to before me and signed in my presence,

Date: October 21, 2021*Judge's signature*City and state: Laredo, TexasDiana Song Quiroga, U.S. Magistrate Judge*Printed name and title*

AFFIDAVIT

In support of Criminal Complaint

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

Lazaro SANCHEZ JR

Case Number:

On October 19, 2021, a United States Border Patrol Agent (BPA) was working his assigned duties at the Laredo West Border Patrol Checkpoint (B35) located on United States Highway 83 north of Laredo, Texas in Webb County. At approximately 3:20 p.m., a white Nissan Versa approached the primary inspection lane.

The BPA conducted an immigration inspection of the driver, Sanchez Jr., Lazaro. Sanchez Jr. advised he was a United States citizen (USC). The BPA then questioned the front passenger, Morales-Rodriguez, Blendy Belen. Morales-Rodriguez did not acknowledge the BPA, avoided eye contact by continuing looking straight forward, and did not respond to the BPA's questions. The BPA then asked the driver to roll down the rear window. Upon the driver lowering the back window, the BPA observed four individuals seating in the rear seat. The BPA questioned the rear passengers as to their immigration status. The rear passengers avoided eye contact and did not respond to the BPA's questions. The BPA instructed Sanchez Jr., to proceed to the secondary for further questioning.

During questioning in secondary, Morales-Rodriguez, and the four rear passengers, stated they were citizens of Mexico and admitted being illegally present in the United States. All the occupants of the vehicle were placed under arrest and escorted inside the checkpoint for further processing.

Sanchez Jr., Lazaro was read his Miranda Rights and understood and acknowledged his rights by signing the service form I-214, and was willing to provide a statement without a lawyer present.

Sanchez Jr. stated an associate known as "Flaco" asked him if he wanted to make some extra money and that "Flaco" would pay him approximately \$130 United States Dollars (USD) for each person he smuggled. Sanchez Jr. stated he picked up the five individuals at a mechanic shop in Laredo, Texas. Sanchez Jr. stated that "Flaco" had instructed him to drop off the individuals just south of the checkpoint on United States Highway 83. However, as they approached the checkpoint, a marked Border Patrol unit got behind him. Sanchez Jr. stated he had had no choice but to go through the checkpoint.

Morales-Rodriguez, Blendy Belen, is a citizen of Mexico, stated her cousin in Motozintla, Chiapas, Mexico paid an unknown person \$50,000 Mexican Pesos to help her get to Orlando, Florida. Morales-Rodriguez stated she illegally crossed the Rio Grande River near Laredo, Texas on October 17, 2021, at approximately 7:00 p.m., and was eventually picked up by a black pickup truck parked near a paved road. She was then taken to a house where she stayed for approximately two days with six other individuals. Morales-Rodriguez stated that on October 19, 2021, a man entered the house and instructed her and other individuals to get into a white vehicle. Morales-Rodriguez stated that as they left the house, the driver of the white vehicle told them that when he stopped, they were all going to exit the vehicle and run towards the brush and wait for another vehicle. Morales-Rodriguez stated they drove for about an hour before they approached a Border Patrol Checkpoint. Morales-Rodriguez stated as they approached the checkpoint, a Border Patrol unit pulled behind them and the driver, Sanchez Jr., said in the Spanish, "we've been caught". Sanchez Jr. instructed Morales-Rodriguez to remain calm and engage in a conversation with him as if they were a couple. Morales-Rodriguez said she did not want to answer the primary BPA when questioned but did admit to being a citizen of Mexico and in the United States illegally when questioned by the other BPA. Morales-Rodriguez was asked If she was able to describe the driver of the white vehicle. Morales-Rodriguez was able to describe all the items of clothing Sanchez Jr. was wearing.

SUBSCRIBED and SWORN to before me on

21st day of October, 2021

Signature of Judicial Officer

/S/ Medrano, Javier Border Patrol Agent

Signature of Complainant